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June 18, 2021

The Honorable Judge Laura T. Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *United States v. Kwang Kyu Kim, et al.*, 18 Cr. 882 (LTS)

Dear Judge Swain:

This law firm represents Tien Chih Wang, a defendant in *USA v. Kwang Kyu Kim, et al.*, 18 Cr. 882 (LTS). On April 13, 2021, a final judgment was entered against Mr. Wang for time served, three years of supervised release, forfeiture, a fine and a special assessment. *See*, Dkt. No. 235. He remains fully compliant on all of his obligations under the judgement.

Mr. Wang respectfully requests a minor amendment to the conditions of his supervised release to permit domestic travel. In recognition of the low risk he presents, Mr. Wang has been placed on the “low intensity unit” for supervision. With the criminal matter concluded, there is no further need to restrict Mr. Wang’s ability to travel domestically. As there is no pending case, there is no flight risk. Accordingly, we seek to have the requirement to pre-clear all travel outside of the Eastern District of New York removed for any travel within the United States. Mr. Wang understands that for any international travel he would still be required to obtain permission from the Department of Probation.

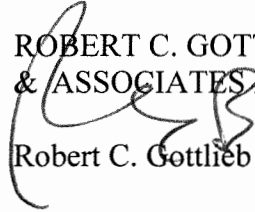
Beginning in November 2019, while the case was pending, Mr. Wang was permitted to travel to Vermont, Massachusetts, Pennsylvania and Connecticut without any issue. Through the entirety of the matter, Mr. Wang has never had any issue abiding by the conditions of pre-trial services and was at all times compliant with their mandates. He will continue being compliant with the terms of his probation, and merely seeks the ability to take his family on ski vacations in the winter or beach vacations in the summer without having to alert the Department of Probation 45 days prior to any travel.

I have spoken to AUSA Thane Rehn regarding this request and the Government has no objection to removing the domestic travel restrictions from Mr. Wang’s conditions of probation.

Thank you for the Court's time and consideration. I remain available for a conference should Your Honor deem it necessary.

Respectfully submitted,

ROBERT C. GOTTLIEB
& ASSOCIATES PLLC


Robert C. Gottlieb

cc: Nathan Rehn, A.U.S.A.

The request is granted. Mr. Wang's conditions of supervised release are hereby amended to allow unrestricted domestic travel. DE #236 resolved.

SO ORDERED.

6/22/2021

/s/ Laura Taylor Swain, Chief USDJ